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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Amelia Ponce,	)	Case No. 1:20-cv-01664-EPG
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
vs.	)	
	)	
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from September 1, 2021 to October 1, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time, but the first extension for the merit brief. Good cause exists for the extension request.

Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due the week of August 30, 2021. Counsel for Plaintiff has three letter briefs, one

1 Plaintiff's Portion of Joint Submission, three Opening briefs, and one Reply brief due the same  
2 week. Additionally, Counsel has recently received a greater number of Answers and Certified  
3 Administrative Records from defendant in cases in this district, and the three other California  
4 Districts, each of which require settlement negotiations or merit briefing. Counsel is in the  
5 process of increasing staff support to accommodate the increase in the number of cases at the  
6 briefing stage.

7 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant  
8 and Court for any inconvenience this may cause.

9  
10 Respectfully submitted,

11 Dated: August 31, 2021

PENA & BROMBERG, ATTORNEYS AT LAW

12  
13 By: /s/ Jonathan Omar Pena  
14 JONATHAN OMAR PENA  
Attorneys for Plaintiff

15  
16 Dated: August 31, 2021

PHILLIP A. TALBERT  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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20  
21 By: \*/s/ Marcelo N. Illarmo  
22 Marcelo N. Illarmo  
23 Special Assistant United States Attorney  
Attorneys for Defendant  
24 (\*As authorized by email on August 31, 2021)  
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**ORDER**

Pursuant to the stipulation of the parties (ECF No. 20), IT IS HEREBY ORDERED that Plaintiff shall file and serve an opening brief no later than October 1, 2021. All subsequent deadlines are extended accordingly.

IT IS SO ORDERED.

Dated: **September 1, 2021**

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE